

Holy Cross Tribe
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February 23, 2022

Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
U.S. Fish & Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Re: Special Action Request for Yukon River Chinook and summer/fall chum salmon during the 2022 season.

Dear Mr. Christianson:

I am writing to submit this Federal Special Action Request, requesting the Federal Subsistence Board to uphold the conservation and priority consumptive uses provisions under Title III and VIII of ANILCA by assuming management of Yukon River Chinook and summer/fall chum salmon throughout the 2022 season, by closing Federal public waters of the Yukon River drainage to the harvest of Chinook and chum salmon, except by federally-qualified subsistence users in 2022 and by conducting an ANILCA 804 Analysis to determine which federally qualified subsistence users have a federal subsistence priority. Significant changes have occurred since the Federal Subsistence Board last considered Yukon River salmon Special Action Requests in 2015. Yukon River Chinook and chum salmon populations have suffered catastrophic declines in abundance in recent years culminating in the 2021 season providing no harvest opportunities and creating significant food security concerns among Yukon River tribes and residents.

The current Yukon River salmon management system - wherein the state manages the Chinook and chum salmon fisheries with passive consent but no direct intervention by the federal in-season managers for well over a decade – is not working and has repeatedly failed to uphold the provisions of ANILCA.

Over the past decade, this pattern of passive and ineffective federal oversight of state Chinook salmon management has allowed:

- Other uses, including commercial fishing, to have priority over subsistence harvest by federally qualified users. This includes years when our long-term average customary harvest amounts of Chinook salmon were not achieved.

- Escapement goals necessary for conservation and rebuilding our declined Chinook salmon have not been met in a number of years, including a failure to meet escapement goals to Canada in 2007, 2008, 2010, 2011, 2019, 2020 and 2021.
- Inequity of harvest, wherein some portions of the Yukon River were open for Chinook salmon harvest while other portions were arbitrarily closed to harvest.

In summary, federal management is necessary to ensure the healthy conservation of Chinook and chum salmon stocks as required by ANILCA in order to support future subsistence harvests. Without federal management, when a sustainable harvest of Chinook and chum salmon is available in the future, federally qualified users will not be ensured the priority and opportunity for customary and traditional uses of the Yukon Chinook salmon that is required by Title VIII of ANILCA. Our customary and traditional subsistence uses will be compromised by other regulatory regimes that do not prioritize subsistence uses.

Respectfully,

A handwritten signature in blue ink, appearing to read "Eugene Paul", written in a cursive style.

Eugene Paul,
First Chief
Holy Cross Tribe